

IN THE DISTRICT COURT IN AND FOR MUSKOGEE COUNTY  
STATE OF OKLAHOMA

TIFFANY MILLER,

Plaintiff,

vs.

LOWE'S HOME CENTERS, LLC,

Defendant.

Case No.: CS-21-319

PETITION

1. This cause of action arises out of injuries sustained by the Plaintiff on the premises of the Defendant, located in the City of Muskogee.
2. On May 28, 2021, the Plaintiff, Tiffany Miller, was shopping at the Lowe's Store in Muskogee, Oklahoma when she was struck by a cart being pushed by an employee of the Defendant Lowe's Home Centers, LLC. Said employee was acting within the course and scope of their employment at the time of the incident.
3. On May 28, 2021, the Plaintiff, Tiffany Miller, was a business invitee on the Defendant's premises. The Defendant owed a duty to the Plaintiff to exercise ordinary care and to keep the premises in a reasonably safe condition for the reception of it's visitors. The Defendant breached this duty owed to the Plaintiff, Tiffany Miller.
4. As a result of the Defendant's negligence, the Plaintiff sustained very serious injuries, has incurred medical expenses, and pain and suffering.

WHEREFORE, premises considered, plaintiff prays for judgment against the defendant for damages in an amount in excess of \$75,000.00, plus interest, costs, and for such other and further relief this court deems just and equitable.

Respectfully submitted,  
MICHAEL A. FINERTY  
P. O. Box 1542  
436 Court Street, Suite D  
Muskogee, OK 74402

ATTORNEY LIEN CLAIMED

By: Michael A. Finerty  
Michael A. Finerty, OBA #12099

FILED BY ROBIN H. HARRIS  
DISTRICT COURT CLERK  
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MUSKOGEE COUNTY, OK